

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THOMAS LUCA JR., individually and on : CIVIL ACTION
behalf of all others similarly situated, :
 :
Plaintiff, :
 :
 :
v. :
 :
 :
WYNDHAM WORLDWIDE :
CORPORATION, WYNDHAM HOTEL :
GROUP, LLC, WYNDHAM HOTELS :
AND RESORTS, LLC, and WYNDHAM :
HOTEL MANAGEMENT, INC., : **Electronically Filed and Served**
 :
Defendants. :

**MOTION FOR ADMISSION *PRO HAC VICE* OF
KATHLEEN ANN BROGAN**

David A. Strassburger, Esquire, undersigned counsel for Defendants, Wyndham Worldwide Corporation, Wyndham Hotel Group, LLC, Wyndham Hotels and Resorts, LLC, and Wyndham Hotel Management, Inc., hereby moves that Kathleen Ann Brogan, Esquire be admitted to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Defendants, Wyndham Worldwide Corporation, Wyndham Hotel Group, LLC, Wyndham Hotels and Resorts, LLC, and Wyndham Hotel Management, Inc., pursuant to LCvR 83.2 and LCvR 83.3 and this Court's Standing Order Regarding *Pro Hac Vice* Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this Motion, undersigned counsel attaches the Affidavit for Admission *Pro Hac Vice* of Kathleen Ann Brogan filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

Respectfully submitted,

WYNDHAM WORLDWIDE CORPORATION

By: /s/David A. Strassburger
David A. Strassburger
PA ID No. 76027

Four Gateway Center, Suite 2200
444 Liberty Avenue
Pittsburgh, PA 15222
Telephone: (412) 281-5423
dstrassburger@smgglaw.com

*Counsel for Defendants, Wyndham
Worldwide Corporation, Wyndham
Hotel Group, LLC, Wyndham Hotels
and Resorts, LLC, and Wyndham Hotel
Management, Inc.*